

BY: Elizabeth Martinez
DEPUTY

§
§ **Notice of Government's Demand for**
§ **Forfeiture**

COUNTS TWO THROUGH ELEVEN
(18 U.S.C. § 2251(a) & (e) – Production of Child Pornography)

Between on or about the dates set forth in the table below, in the Western District of Texas, the District of New Mexico, and the Northern District of Texas, Defendant,

JOHNNY GEORGE GONZALEZ,

did employ, use, persuade, induce, entice, and coerce the minor victims described in the table below and whose identities are known to the United States Attorney, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was transported in and affecting interstate and foreign commerce, to wit, from the Northern District of Texas, to the Western District of Texas, via the District of New Mexico, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT	DATE(S) (Approximate)	VICTIM, AGE (Approximate)	FILE DESCRIPTION
2	August 1, 2021	T.R., 10 years old	5 photographs and 6 videos depicting the lascivious exhibition of the anus and genitals of T.R.
3	April 24, 2021	T.R., 10 years old	4 videos depicting the digital penetration of T.R.'s vagina and the lascivious exhibition of the anus and genitals of T.R.
4	January 30, 2021	I.V., 8 years old	4 photographs depicting the lascivious exhibition of the genitals of I.V.

5	November 16, 2019	A.F., 7 years old	4 videos depicting the penetration of A.F.'s anus with a sharpie marker and finger, the penetration of A.F.'s vagina with a finger, and the lascivious exhibition of the anus and genitals of A.F.
6	October 22, 2019	A.F., 7 years old	2 videos depicting the digital penetration of A.F.'s vagina and the lascivious exhibition of the anus and genitals of A.F.
7	July 26, 2019	A.F., 7 years old	16 photographs and 3 videos depicting the penetration of A.F.'s anus by an adult penis and finger, and the and the lascivious exhibition of the anus and genitals of A.F.
8	September 1, 2016 - November 30, 2016	P.R., 4 years old	11 photographs depicting the and the lascivious exhibition of the genitals of P.R.
9	October 2, 2015	V.V., 9 years old	2 videos depicting the digital penetration of V.V.'s anus and vagina, and the and the lascivious exhibition of the anus and genitals of V.V.
10	May 3, 2015	V.V., 9 years old	13 photographs depicting the penetration of V.V.'s anus with an adult penis, a tube, and a finger, and the lascivious exhibition of the anus and genitals of V.V.

11	May 9-10, 2014	V.V., 8 years old	15 photographs depicting the digital penetration of V.V.'s vagina, and the lascivious exhibition of the anus and genitals of V.V.
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NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Sexual Exploitation of Children Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 2241(c), 2251(a), and (e), subject to criminal forfeiture pursuant to Title 18 U.S.C. §§ 2253(a)(1), (2), and (3)]

As a result of the criminal violations set forth in Counts One through Eleven, the United States gives notice of its intent to seek the forfeiture of the properties described below from Defendant **JOHNNY GEORGE GONZALEZ** upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1), (2), and (3), which state:

Title 18 U.S.C. § 2253. Criminal Forfeiture

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(a) **Property subject to criminal forfeiture.**- A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeiture to the United States such person's interest in-

- (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the properties described in Paragraph II.

II.
Properties

1. Westgate computers 31072;
2. Lenovo ThinkStation, bearing serial number PCOFL10K;
3. HP Pavilion Slimline, bearing serial number 3CR9440J03;
4. Lenovo ThinkPad- Hilmar Cheese Company, bearing serial number PC03BPZW;
5. Lenovo ThinkPad- Hilmar Cheese Company, bearing serial number 20AN-0069UST44OP;
6. SanDisk Impact 256MB;
7. Western Digital WD Caviar, bearing serial number WCAP96000796;
8. Western Digital WD Caviar, bearing serial number WCAT14219672;
9. Seagate 2000GB Barracuda, bearing serial number S1E1LZ38;
10. Western Digital SATA/32MB Cache 500GB, bearing serial number WCAV92732664;
11. Seagate 500GB Barracuda, bearing serial number Z3TBCW4K;
12. Toshiba 1.0TB, bearing serial number 367YMZ3NS U93;
13. Axiom Memory Solutions 2GB, bearing serial number 15899;
14. Axiom Memory Solutions 4GB 51272V8D3R13811;
15. Samsung 2GB M393B5673EH1- CH9Q1 1008;
16. Samsung 2GB M378B5673FH0- CF8 1016;
17. Samsung 2GB M393B5673FH0- CH9Q5 MIII5;
18. Hynix 2GB HMT325U6BTR8C- H9 NO AA;
19. Kingston KVR 9931070- 001 A00G;
20. HP Laptop, model 14- AX020WM, bearing serial number 5Cd63673N4;
21. iPad, model A1432, bearing serial number F7QM2PGBFP84;
22. iPhone, model A1784, IC ID: 579C- E3092A;
23. iPhone, model A1429, IMEI: 990002794730612;
24. iPhone S, model A1633, IC ID: 579C- E2946A;
25. PNY 8GB;
26. SanDisk Cruzer 64GB;
27. SanDisk Cruzer Glide 32GB;
28. SanDisk 128GB;
29. SanDisk Cruzer Edge 8GB;
30. SanDisk Cruzer Micro 4.0GB;
31. Kingston 32GB;
32. Kingston DTSE9 G2 16GB;
33. Kingston DTSE9 G2 32GB;
34. MECO Thumbdrive;
35. SanDisk Ultra 8GB SD card;
36. WD My Passport, bearing serial number WX11DA9ACCEK;

37. WD My Passport, bearing serial number WXF1LB85W739;
38. WD My Passport, bearing serial number 20039C805792;
39. Tripp Lite hard drive, bearing serial number 2717AKSCU883E00663;
40. Seagate hard drive, bearing serial number ZDE013CF;
41. GoPro;
42. Lenovo laptop; bearing serial number MJ- OBVQVT;
43. Dell Latitude 7480 ;
44. iPhone 12 ProMax, bearing serial number G0NDVKYU0D46;
45. Sapphire Shell with Western Digital hard drive, bearing serial number 195206803910;
46. Seagate Expansion desktop drive, bearing serial number 195206803910;
47. Acer, bearing serial number 53604664923;
48. SanDisk Extreme Pro SD card 170MB/128GB;
49. Axiom USB drive, bearing serial number FMB950149;
50. Kingston DTSE9 G2 USB 3.0 16GB;
51. Kingston DTSE9 G2 USB 3.0 32GB;
52. 1 Silver USB;
53. SanDisk adapter with microSD 128;
54. Lenovo ThinkPad, model T460, bearing serial number PC-0HUC53;
55. Intel SSD pro 5400S series, ISN: CVLT703301LY256HGN;
56. Kingston Digital USB adapter Mobile light G4, with CE FC CL831810LX;
57. SanDisc SD card 170MB;
58. WD Blue 500GB 3D and SATA SSD Solid State Drive, bearing serial number 19488C802868;
59. Seagate, bearing serial number WN905M90;
60. Western Digital hard drive, bearing serial number WMAV52019414;
61. Western Digital hard drive, bearing serial number WMAV2S001500;
62. iPhone, model A1428, IMEI: 013428007215047;
63. iPhone, model A1532, IMEI: 358822050882484;
64. iPhone, model A1549 IMEI: 35446067938222;
65. Black Logitech USB;
66. iPhone 5S, IMEI: 013789008734124;
67. SanDisk adapter and microSD 128GB
68. WD blue desktop hard drive, bearing serial number WCC1S8397386;
69. WD My Passport Ultra hard drive, bearing serial number WXAE54LMT69;
70. Western Digital hard drive, bearing serial number WX61AB753S19;
71. Western Digital hard drive, bearing serial number BNGPJTB E;
72. Western Digital hard drive, bearing serial number 20036F805124;
73. Western Digital hard drive, bearing serial number WXP1A870K5PS;
74. Advanced Format hard drive, bearing serial number Y9HA96XB;

- 75. Advanced Format hard drive, bearing serial number Y9KTG3BM;
- 76. Seagate hard drive, bearing serial number 5RQ00VD3;
- 77. Toshiba hard drive, bearing serial number 22BBCE8DT;
- 78. Toshiba hard drive, bearing serial number 35BMWET3T;
- 79. Seagate hard drive, bearing serial number WN90B12R;
- 80. Seagate hard drive, bearing serial number ZDE014LE;
- 81. SanDisk hard drive, bearing serial number 161278405550; and
- 82. Any and all other property and/or accessories involved in or used in the commission of the criminal offense; and
- 83. Any and all other property involving any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260.

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